Roy F. Weston, Inc.
Federal Programs Division
217 Middlesex Turnpike
Burlington, Massachusetts 01803-3308
617-229-6430 • Fax 617-272-3619

SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM
EPA CONTRACT 68-W5-0009

6 March 1997
11098-011-001-1162-40
DC No. A-806

Mr. Leonard Jolles
Whitinsville Redevelopment Trust
The Shop at Whitinsville
1 Main Street
Northbridge, Massachusetts 01588

Subject: Trip Report -- On-site Reconnaissance
Covitch Property/Former ATF Davidson Co.
Northbridge, Massachusetts
CERCLIS No. MAD046128559
TDD No. 95-07-0065

Dear Mr. Jolles:

Please find enclosed a copy of the Trip Report regarding the Covitch Property/Former ATF Davidson Co. property located in Northbridge, Massachusetts.

Please contact the undersigned at (617) 229-6430 if you have any questions or concerns regarding this report.

Very truly yours,

ROY F. WESTON, INC.
Region I START

Michael G. Jennings
Site Leader

John F. Kelly
Project Leader

MGJ:mgj
Enclosure
cc: D. Till (EPA Task Monitor)
N. Smith (EPA Site Assessment Manager)

EPA-New England REGION 1 SUPERFUND PROGRAM
TRIP REPORT/CHECKLIST

Inspection Information

Site Name: Covitch Property/Former ATF Davidson Co.
Address: Main Street
Town: Northbridge **State:** Massachusetts
CERCLIS No.: MAD046128559 **TDD No.:** 95-07-0065
Date of Inspection: 2 May 1996 **Time of Inspection:** 0800 hrs
Weather Conditions: Partly cloudy, 60 °F
Site Status at Time of Inspection: **(X) ACTIVE**
( ) INACTIVE
( ) ABANDONED

Comments: The Covitch Property/Former ATF Davidson Co. property (the property) is a former mill complex which has been refurbished and now operates as leased manufacturing and industrial warehouse space. The property was originally developed in the late-1800s as a foundry and metal fabrication mill by the Whitin Machine Works (Whitin). Whitin operated on the property for a number of years. At some point Whitin ceased operations on the property and White Consolidated Industries (WCI) commenced on-site operations. A second company; ATF Davidson, Co., a subsidiary of WCI, also operated on the property. WCI and ATF Davidson, Co. ceased operations on the property sometime in the late-1970s or early-1980s. The property is presently owned by the Whitinsville Redevelopment Trust and the Arcade Realty Trust.

The property is approximately 65 acres, located on both sides (north and south) of the Mumford River. Past manufacturing operations on the property included, metal casting, machining, and finishing. Presently, there are approximately 30 companies utilizing space on the property for manufacturing and warehousing operations.

Two distinct disposal areas exist on the property. The first area consists of approximately 40,000 cubic yards of foundry-type wastes which were disposed of on the main property by Whitin and WCI. The second disposal area, which has been described as a "coal ash disposal area", is located south of the Mumford River, separate from the larger main property disposal area.

Two distinct areas of groundwater contamination are also associated with the property. An area of oil and grease contamination was detected on the eastern extent of the property in 1985. The second area of groundwater contamination, also discovered in 1985, is located at the western extent of the property. Several VOCs have been detected in multiple monitoring wells on the western portion of the property.

TRIP REPORT

Personnel Performing Inspection

	Names	Program
( ) EPA-New England:		
(X) EPA-New England Contractor:	Michael G. Jennings	START
	John F. Kelly	START
( ) State:		
( ) Other:		

Site Ownership-Current Owner

Name: Whitinsville Redevelopment Trust and Arcade Realty Trust
Address: 1 Main Street, Northbridge, Massachusetts
Telephone: (508) 234-6301

Site Visit: Brief Chronology

0800 hrs Roy F. Weston, Inc. (WESTON®) Superfund Technical Assessment and Response Team (START) personnel arrived at the property.

0810 hrs START Site Health and Safety Coordinator completed calibration checks and determined site ambient background conditions for monitoring instruments.

0815 hrs START personnel met with representatives of past and present owners of the property to explain the on-site reconnaissance process. Personnel present at the meeting included START members Mr. Michael Jennings and Mr. John Kelly; Mr. Leonard S. Jolles and Mr. Thomas Lonergan, both representing Whitinsville Redevelopment Trust (WRT) and Arcade Realty Trust (ART), the present owners; Mr. Douglas E. Mix, representing WCI (past owners of the property); Mr. Neal M. Drawas, representing Kroll Environmental Enterprises, Inc. (KEE), an environmental consultant to WRT and ART; and Mr. Matthew F. Eichler and Mr. Craig R. Gendron, representing Caswell, Eichler, Hill, Inc. (CEH), an environmental consultant to WCI.

0930 hrs START personnel concluded the introductory meeting and began a walkover of the exterior portions of the property; which included photodocumenting areas of concern. Present during the exterior walkover were START members Mr. Jennings and Mr. Kelly, Mr. Lonergan, Mr. Mix, Mr. Eichler, Mr. Gendron, and Mr. Drawas. Mr Jolles was present for only portions of the exterior walkover.

Site Visit: Brief Chronology (Concluded)

1205 hrs START personnel completed the walkover of the exterior portions of the property and proceeded to conduct a reconnaissance of the interior portions of the on-site buildings; which included photodocumenting areas of concern. Present during the interior walkover were START members Mr. Jennings and Mr. Kelly, Mr. Lonergan, and Mr. Drawas.

1445 hrs START personnel completed the interior walkover of the on-site building interiors and proceeded to conduct a concluding meeting with the representatives of WRT and KEE. Present during the meeting were START members Mr. Jennings and Mr. Kelly, Mr. Jolles, Mr. Lonergan, and Mr. Drawas.

1530 hrs START personnel traveled to Douglas Road for further investigation of the alleged coal ash disposal area.

1610 hrs START personnel departed the property.

Site Characteristics

******* See attached site sketch *******

Quantities/Extent/Details

(X) Cylinders: Approximately 50 propane fuel cylinders were observed in several buildings throughout the mill complex. These propane cylinders fuel the forklift trucks utilized by the mill complex tenants for material handling.
(X) Drums: Outside, six 55-gallon metal drums and one 55-gallon plastic drum were observed. Of these seven drums, one crushed and rusted metal drum was observed under a metal walkway in the vicinity of the former powerplant, two empty and rusted metal drums were observed on the western extent of the property, and three empty metal and one empty plastic 55-gallon drums were observed in the unpaved portion of the employee parking lot on the south side of the Mumford River.

Inside the mill complex, approximately 70 55-gallon metal drums were observed in the manufacturing areas of several of the current tenant companies. Labels on the drums indicated that the drums contained both virgin material and waste products associated with the various manufacturing operations conducted on the premises by each business. Approximately 50 drums were observed with labels indicating that they contained "waste oil" or "hazardous waste" with the remainder of the drums containing the previously mentioned virgin material.

Site Characteristics (Continued)

Quantities/Extent/Details

( ) **Lagoons:**

(X) **Tanks:** (X) **Above-ground:** One 275-gallon diesel fuel above-ground storage tank (AST) was observed outside on the northwest corner of the property. According to Mr. Lonergan, the diesel fuel is used to power facility maintenance vehicles such as snow plows.

An additional storage tank, believed to be an AST, was observed in the debris piles on the large foundry-waste landfill. The tank appeared to have been removed from an on-site building during a renovation, since it was strewn with the renovation debris. START personnel estimated the AST volume to be approximately 300 gallons. The original contents of the AST were unable to be determined by START personnel.

(X) **Below ground:** A concrete vault, covering what was described by the property owner as a "filled-in-place" underground storage tank (UST), was observed adjacent to building no. 12. An elevated reading of 4 units above background was monitored on the flame ionization detector (FID) in the vicinity of the vault.

( ) **Asbestos:**

(X) **Piles:** Several piles of scrap material, such as metal piping, metal duct, and demolition debris, were observed on the foundry sand landfill. The material appeared to consist of construction and demolition waste associated with the current redevelopment of the property. Several electric motors were also observed strewn within the debris.

Several piles of construction and demolition waste were also observed on the unpaved portion of the employee parking lot, located south of the Mumford River. This material appeared to primarily consist of bricks, concrete blocks, and cement pieces.

(X) **Stained Soil:** Several areas of stained soil were observed in the vicinity of the debris piles on the foundry sand landfill. These areas were stained black from an oily-type material.

( ) **Sheens:**

(X) **Stressed Vegetation:** A general lack of vegetation was observed amongst the two disposal areas (landfills). Sporadic grassy vegetation was observed on the two disposal areas, but vegetation on the adjoining non-disturbed areas consisted of heavily overgrown grass, shrubs, and trees, typical of the indigenous vegetation of the area.

(X) **Landfill:** Two distinct areas of landfilled material were observed on the property. One area was observed north of the Mumford River, on the main portion of the property. This landfill contained foundry sand, coal ash, slag, and other materials. Approximately 40,000 cubic yards of material have been landfilled and graded into the Mumford River. The graded material has a surface area of approximately 730,000 square feet. The graded material now connects a former island to the northern shore of the Mumford River, forming a peninsula.

Site Characteristics (Continued)

Quantities/Extent/Details

The second area of landfilled material was observed south of the Mumford River, along Douglas Road. This disposal area is a separate parcel, non-contiguous with the main property. Past environmental reports refer to this area as a "former coal ash disposal area off of Douglas Road." A black, uniform-grained, non-native material was observed in what START personnel believed to be the vicinity of the former coal ash disposal area. START personnel were unable to locate the overburden groundwater monitoring wells which would have verified that the area in question was the former coal ash disposal area. The surficial extent of the second landfill was observed by START personnel to be approximately 7,500 square feet (50 feet wide by 150 feet long).

( ) **Leachate seeps:**

(X) Population in Vicinity: An apartment, housing an employee of WRT and his family, is presently located within the mill complex. Four people currently reside in the apartment. There are approximately 1,200 people working for the numerous businesses located within the mill complex.

(X) Distance to nearest residence: The nearest off-site residence is located on Water Street, approximately 50 feet northeast of the large foundry-waste landfill.

(X) Land use: **(X) Industrial** **(X) Commercial** **(X) Residential**
( ) Rural **( ) Agricultural**

(X) Wells: **( ) Drinking:**

(X) Monitoring: Numerous stick up monitoring wells were observed throughout the property. Several of the monitoring wells (MC-13, MC-11, and M-4) were damaged. According to WRT representatives, these wells had been struck by snow plow vehicles. The majority of the remaining monitoring wells were located along the northern shore of the Mumford River. In addition, monitoring wells were also observed along the Main Street property boundary. All of the undamaged stick up monitoring wells were locked, with the exception of three monitoring wells (M-9, M-10, and M-11), which also did not contain protective casings. These three monitoring wells were observed on the Arcade property in the vicinity of monitoring well M-8.

Three flush-mounted monitoring wells were observed adjacent to Building No. 9. These monitoring wells were believed to be observation wells (OW-1, OW-2, and OW-3), components of a former groundwater remediation system.

No elevated readings (above background) were detected with the FID at any of the observed monitoring wells, regardless of well condition.

(X) Other:

Several large pipes (plastic, metal, and reinforced concrete) were observed protruding from the northern shoreline of the Mumford River, where the shoreline borders the property. The large pipes were noted above and below the surface of the water. Past environmental reports for the

Site Characteristics (Concluded)

Quantities/Extent/Details

property indicate that electroplating wastewater was formerly discharged to the Mumford River. The present owners of the property were unable to provide any additional information concerning the discharge of industrial wastewater to the Mumford River.

Many of the companies leasing space within the property utilize flammable material in their manufacturing operations. Numerous explosion-proof flammable storage cabinets were observed in various buildings throughout the property. Additionally, several spray booths were observed operating in several of the manufacturing areas located throughout the on-site buildings. Several hazardous materials were observed in use during the on-site reconnaissance. These materials consisted of paints, thinners, solvents, inks, wood stains, adhesives, and cutting fluids/coolants.

On-site/Off-site Receptors

Comments/Details

(X) Drinking Water

(X) **Private:** The exact location of the nearest private well could not be determined by the Whitinsville Water Company or the Northbridge Board of Health. According to the CENTRACTS report, prepared by Frost Associates for the property, an estimated 16 people within 0.25-radial miles and 231 people within 1-radial mile of the property utilize private groundwater wells for drinking water.

(X) **Municipal:** The nearest municipal well is the Whitinsville Station located in Northbridge, Massachusetts. This well is located approximately 0.9 miles northwest of the property. The well is operated by the Whitinsville Water Company and serves approximately 2,814 people in Northbridge, Massachusetts.

(X) Groundwater: Groundwater has been found below the property at depths ranging from 3 to 8 feet below grade. General groundwater flow is towards the Mumford River. For parcels north of the river, groundwater flow is towards the south; while for parcels south of the river, groundwater flow is towards the north. In a series of 1985 hydrologic investigations of the property, CEH calculated that the groundwater seepage velocity below the property varied from a minimum of approximately 3.5 feet per year to a maximum of approximately 52 feet per year. CEH also calculated the seepage velocity in the vicinity of the coal ash disposal area to be approximately 3.5 feet per year.

(X) Unrestricted Access: Both vehicular and pedestrian access to the main portion of the property, north of the Mumford River, was observed to be restricted. Three sides of the property were enclosed by a 6-foot-high chain-link fence. There was also a combination of on-site employees and a 24-hour security service who patrol the property. Pedestrian access to the main portion of the property can be gained via the Mumford River. Additionally, vehicular and pedestrian access to the former coal ash disposal area located along Douglas Road on the south side of the Mumford River is unrestricted.

On-site/Off-site Receptors (Concluded)

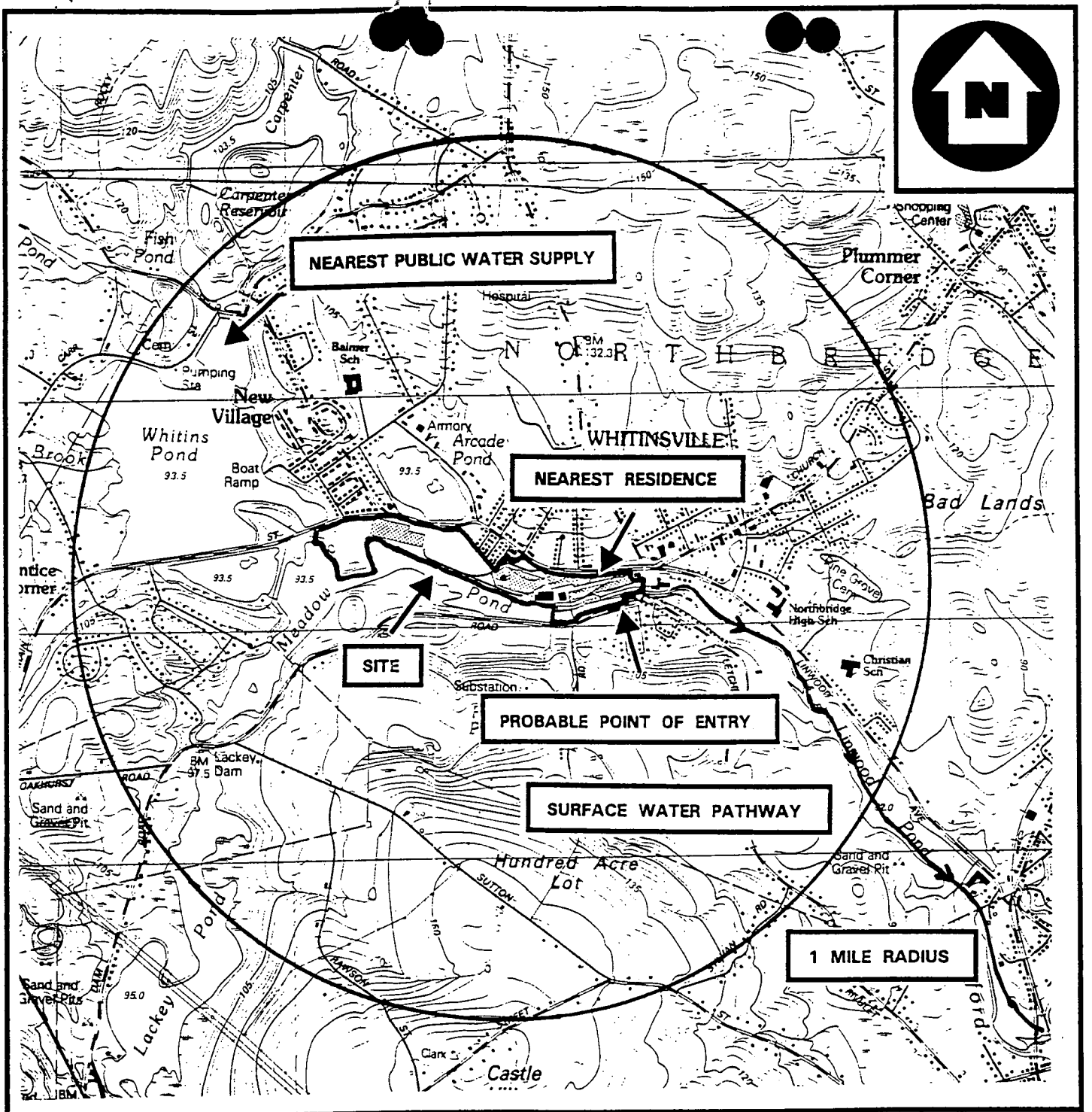
Comments/Details

(X) Population in Proximity: According to the CENTRACTS report for the property, prepared by Frost Associates, Inc., an estimated 1,328 people live within 0.25-radial miles of the property. The CENTRACTS report further states that an estimated 5,327 people live within 1-radial mile of the property.
(X) Sensitive Ecosystem: There are no sensitive environments present on the property. However, the property is bisected by the Mumford River, which comprises the first 4.5 miles of the surface water pathway. Evidence was observed, such as fishing poles and a hand-lettered sign indicating a fishing area, indicating that the Mumford River is a fishery. There are no occurrences of State- or Federal-Threatened or Endangered species located within 1-radial mile of the property. There is approximately 1 acre of wetlands within 0.25-radial miles of the property and 11 acres of wetlands within 1-radial mile of the property.
(X) Other: According to Mr. Jolles, the area alleged to contain the former coal ash landfill is being considered for use by the Town of Northbridge as a municipal soccer field. Mr. Jolles further stated that WRT would retain ownership of the land parcel, leasing it to Northbridge. Currently, the parcel is utilized by the town during the winter as a snow dump during periods of heavy snow.

Site Observations/Concerns

The Covitch Property/Former ATF Davidson Co. property (the property) consists of approximately 65 acres of land on numerous parcels in Northbridge, Worcester County, Massachusetts at the following coordinates (measured from the center of the property): 42° 05′ 34.5″ north latitude and 71° 40′ 34″ west longitude (Figure 1). Parcels associated with the property are located on both the north and south side of the Mumford River, which bisects the property (Figure 2).

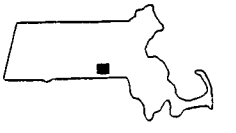
The exact chronology of ownership is difficult to determine; however, the following is known. The property was originally developed in the late-1800s as a foundry and metal fabrication mill by Whitin Machine Works (Whitin). Whitin operated on the property for a number of years. At some point Whitin ceased operations on the property and White Consolidated Industries (WCI) commenced on-site operations. A second company, ATF Davidson, Co., a subsidiary of WCI, also operated on the property in the same time frame. WCI and ATF Davidson, Co. ceased operations on the property sometime in the late-1970s or early-1980s. The property is presently owned by the WRT and the ART. The property is currently operated as leased manufacturing and commercial warehouse space to approximately 30 companies.



BASE MAP IS A PORTION OF THE FOLLOWING 7.5 X 15' U.S.G.S. QUADRANGLE(S):
WORCESTER SOUTH, MA 1983 AND UXBRIDGE, MA 1982

1 0 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET



QUADRANGLE LOCATION

SITE LOCATION MAP

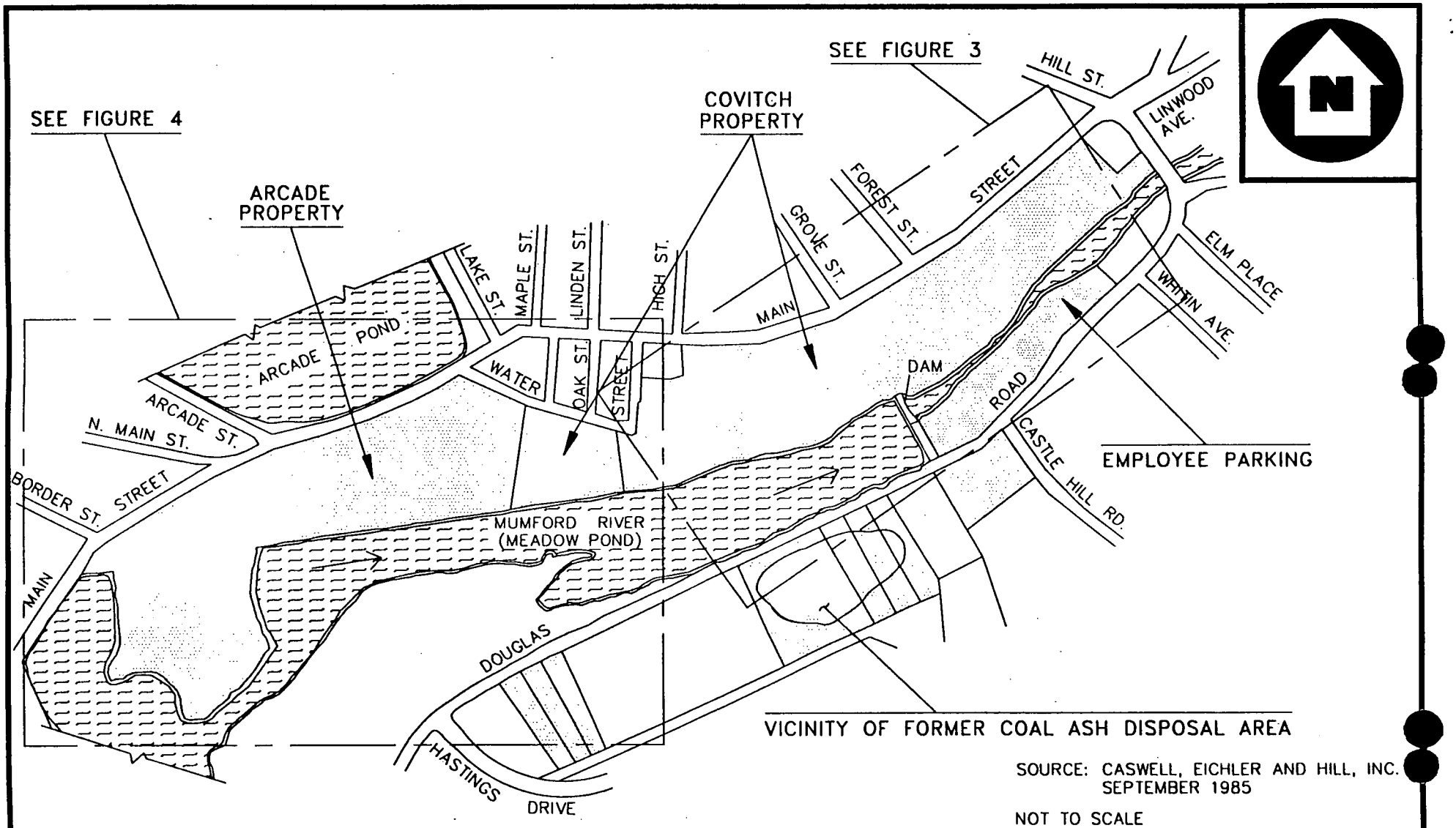
COVITCH PROPERTY
FORMER ATF DAVIDSON CO.
MAIN STREET
NORTHBRIDGE, MASSACHUSETTS

WESTON® MANAGERS DESIGNERS/CONSULTANTS
REGION I SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM

TDD #	DRAWN BY:	DATE
95-07-0065	M. JENNINGS	2/96

FILE NAME: S:\95070065\FIG1

FIGURE 1



SOURCE: CASWELL, EICHLER AND HILL, INC.
SEPTEMBER 1985

NOT TO SCALE

LEGEND

- SURFACE WATER
- SITE PROPERTY
- FLOW DIRECTION

SITE MAP

COVITCH PROPERTY/
FORMER ATF DAVIDSON CO.
MAIN STREET
NORTHBRIDGE MASSACHUSETTS

WESTON®
MANAGERS DESIGNERS/CONSULTANTS
REGION I SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM

TDD #	DRAWN BY:	DATE
95-07-0065	W. SHAW	6/7/96

FILE NAME: S:\95070065\FIG2.DWG

FIGURE 2

Site Observations/Concerns (Continued)

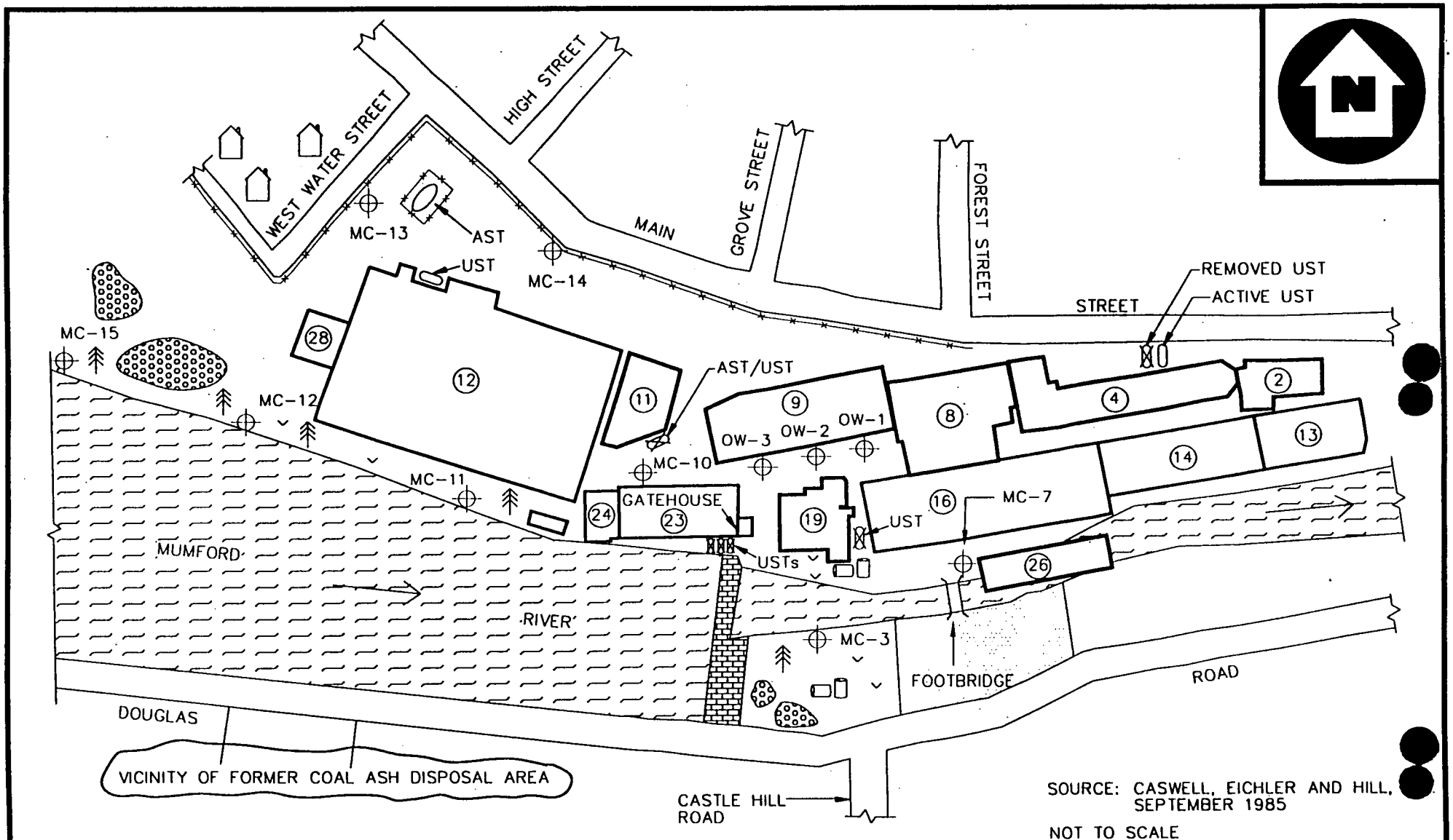
For this evaluation, the eastern developed portion of the property, on the north side of the Mumford River, will be referred to as the Covitch property (Figure 3). The remaining portion of the property on the north side of the Mumford River will be referred to as the Arcade property (Figure 4). There are also two parcels of land on the south side of the Mumford River, a small partially paved employee parking lot and a former coal ash disposal area (landfill). For this evaluation, the employee parking lot will be considered as part of the Covitch property, while the former coal ash landfill will be considered part of the Arcade property. The term *the property* refers to both the Covitch property and the Arcade property as a whole.

As previously mentioned, the property formerly operated as a foundry. Approximately 30 acres of the property, consisting of the entire Arcade property, is land which has been graded and filled with foundry waste. The 1991 Environmental Protection Agency (EPA) Site Inspection (SI) for the property, completed 19 June 1991 by the Massachusetts Department of Environmental Protection (MA DEP), describes the landfilled material as consisting of 90% spent foundry sand, 5% coal ash, and 5% paint, plating sludge, plating rinsewater, bromide salt baths, solvents and cutting oils. According to the 1991 EPA SI, the filled area has a surficial extent of approximately 730,000 square feet, containing approximately 40,000 cubic yards of material.

The Mumford River flows through the property in an easterly direction. With the exception of the employee parking lot and the former coal ash disposal area, the Mumford River forms the southern boundary of the property. The property is perched approximately 5 feet above the river. A large dam on the Mumford River, connecting the main portion of the property to the employee parking lot was formerly used to power the on-site manufacturing operations and later to generate hydroelectricity.

The dam creates an impoundment reservoir which stretches to the western extent of the property and beyond. This portion of the Mumford River is commonly referred to as Meadow Pond. A man-made "Raceway" and a series of locks and gates, which were formerly utilized to divert water from the impoundment reservoir in order to directly power the manufacturing equipment, runs beneath the property and several of the on-site buildings. When the power generation system was in use, the diverted water would be returned to the Mumford River below the dam. The dam, Raceway, locks, and gates still exist on the property; although the locks and gates are currently closed isolating the Raceway from the Mumford River.

On 24 April 1985, an oil sheen was observed on the surface water in the Raceway by an unnamed party. As a result WCI and ATF Davidson Co. retained Caswell, Eichler, and Hill, Inc. (CEH) to conduct a hydrogeological investigation of the property. CEH conducted the investigation in two parts, with the Covitch property and Arcade property investigated separately.



COVITCH PROPERTY SITE MAP

COVITCH PROPERTY/
FORMER ATF DAVIDSON CO.
MAIN STREET
NORTHBRIDGE MASSACHUSETTS

WESTON® MANAGERS DESIGNERS/CONSULTANTS
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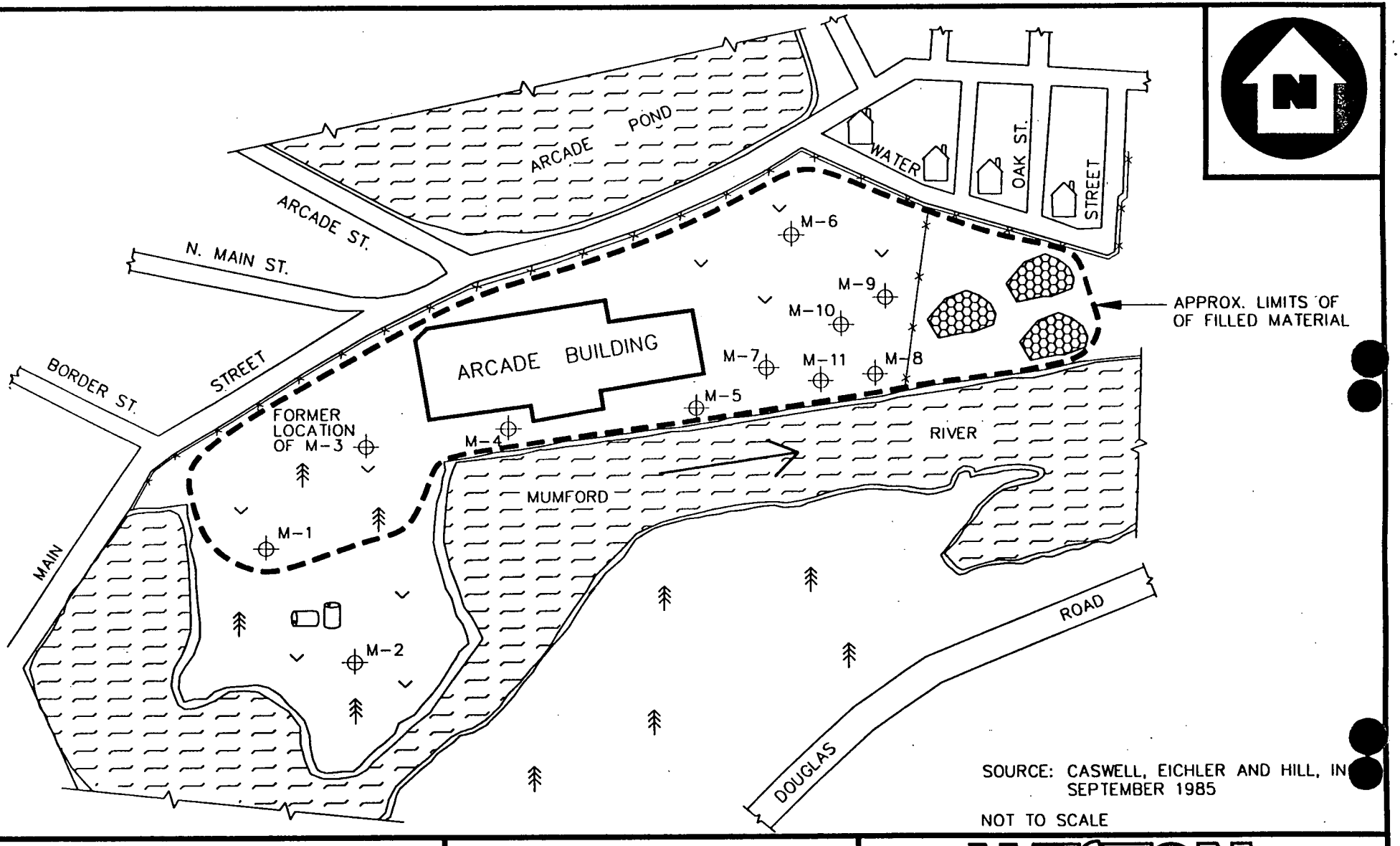
FIGURE 3



SOURCE: CASWELL, EICHLER AND HILL, IN SEPTEMBER 1985

NOT TO SCALE

LEGEND

- M-1 MONITORING WELL (SCREENED IN OVERBURDEN)
- DEBRIS PILE
- SURFACE WATER
- FENCE
- DRUMS
- TREES
- RESIDENCE
- GRASS
- FLOW DIRECTION

ARCADE PROPERTY SITE MAP

COVITCH PROPERTY/ FORMER ATF DAVIDSON CO. MAIN STREET NORTHBRIDGE MASSACHUSETTS

WESTON® MANAGERS DESIGNERS/CONSULTANTS

REGION I SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM

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FIGURE 4

Site Observations/Concerns (Continued)

CEH addressed possible sources of oil contamination near the Raceway in the September 1985 investigation report for the Covitch property. According to the CEH report there have been documented oil releases on both the north and south side of the Raceway. The northern release, occurring over a period of years, was a result of the temporary outdoor storage of metal turnings in the vicinity of Building No. 9 prior to their off-site disposal. The southern release occurred in the basement of the powerhouse, Building No. 19. No further information regarding the oil releases was given in the CEH report.

On 9 December 1985, New England Pollution Control Corporation, Inc. (NEPCCO) was contracted by WCI to install a cut-off trench/well system with a double pump recovery unit, in order to remediate the groundwater contamination problem in the vicinity of Building No. 9, the Raceway, and the Mumford River. The system was installed between 23 December 1985 and 20 June 1986.

The project report indicated that the recovery system was operational from 13 June 1996 until approximately 11 February 1987. According to the 1991 EPA SI report, the recovery and treatment system was shut down in the spring of 1987 at the request of NEPCCO due to decreased levels of VOCs detected in the influent groundwater samples collected from the recovery system. START personnel did not find any information indicating that the treated effluent ever exceeded discharge permit standards.

Results of the CEH investigation of the Arcade property, as stated in the October 1985 report, indicated that the groundwater below the Arcade property contained detectable levels of four VOCs. Vinyl chloride, trans-1,2-dichloroethene, trichloroethene, and tetrachloroethene were detected in one or more of the monitoring well samples at concentrations greater than the reference concentrations. Detected concentrations ranged from 10 ppb for trichloroethene (M-3) to 950 ppb for tetrachloroethene (M-6). Barium was also detected in several groundwater samples at concentrations three times greater than the barium concentration of the reference sample (M-1). Barium was present at the highest concentration (2,900 ppb) in the sample from monitoring well M-5. START personnel chose the groundwater sample collected from monitoring well M-1 as the background location due to its crossgradient location and its uncontaminated condition.

In July 1987 CEH submitted a risk assessment report for the area in the vicinity of monitoring well M-8. The July 1987 CEH report stated that the VOC-contaminated plume in the vicinity of monitoring well M-8 covered approximately 13,100 square feet. In the July 1987 CEH report, CEH theorized that the plume consisted predominantly of a parent compound (trichloroethene) and two weathered species (vinyl chloride and trans-1,2-dichloroethene). The report further stated that the mass balance of chemical compounds present in monitoring well M-8 shifted towards the weathered species. CEH attributed this to a long period of emplacement or an accelerated weathering process. According to the July 1987 CEH report, the chemical contamination detected in the Arcade property groundwater samples was migrating towards the Mumford River where the contamination would ultimately be diluted, diminishing its impact on human health and the environment.

Site Observations/Concerns (Continued)

It was observed, at the time of the START on-site reconnaissance, that there was a general lack of vegetation on the Covitch property due to extensive development, with the exception being a small strip of land bordering the northern bank of the Mumford River. Grass, shrubs, and some small trees were found in this area. The Arcade property also contained a general lack of vegetation at the time of the reconnaissance. The surficial soils of the foundry sand landfill tended to support sporadic grasses and some small trees and shrubs. A former island, which is now connected via landfilled material to the northern shore of the Mumford River at the western extent of the Arcade property, showed thick vegetation; consisting of large trees and shrubs. This condition can be considered typical of the native vegetation of the area.

During the on-site reconnaissance, START personnel attempted to locate the former coal ash disposal area. According to historical information, the former coal ash disposal area is located south of Douglas Road and west of Castle Hill Road. An area of landfilled material was observed in the general vicinity of the historical location of the former coal ash disposal area. The landfilled material consisted of a black uniform grained, non-native material with a surficial extent of approximately 7,500 square feet. However, START personnel were unable to locate monitoring wells MC-1 and MC-2, which were installed on the former coal ash disposal area in conjunction with the September 1985 CEH report. Locating the two monitoring wells would have verified that the area in question was the former coal ash disposal area.

START personnel noted several piles of debris on both the Covitch property and Arcade property during the on-site reconnaissance. On the Covitch property several piles of concrete, brick, metal, and wood debris, associated with the on-going renovation of the property were observed south of the Mumford River. The total surficial extent of these piles was approximately 300 square feet.

On the Arcade property several piles of scrap metal were observed on the foundry sand landfill. These piles were also associated with the on-going renovation of the property. Several electric motors and an AST were strewn in among the debris. The tank volume appeared to be approximately 300 gallons. The total surficial extent of the debris piles was approximately 30,000 square feet. The surficial soils of the foundry sand landfill in the vicinity of the metal debris piles appeared stained with an oily-type material. This stained area will be evaluated as a component of the landfill.

During the on-site reconnaissance, START personnel observed an additional AST in the northwest corner of the Covitch property. The volume of the AST was 275-gallons, according to representatives of WRT. The AST is used to store diesel fuel for vehicles utilized on the property. The AST was situated on a concrete pad. Access to the AST was restricted by a 6-foot chain-link fence.

Site Observations/Concerns (Continued)

During the on-site reconnaissance, START personnel observed several 55-gallon drums in various conditions, throughout the property. Outside, six 55-gallon metal drums and one 55-gallon plastic drum were observed. Of these seven drums, one crushed and rusted metal drum was observed under a metal walkway in the vicinity of the former powerplant, two empty and rusted metal drums were observed on the western extent of the property, and three empty metal and one empty plastic 55-gallon drums were observed on the unpaved portion of the employee parking lot located on the south side of the Mumford River.

START personnel observed several large pipes (plastic, metal, and reinforced concrete) protruding from the northern shoreline of the Mumford River, where the shoreline borders the property. The large pipes were noted above and below the water surface. The 1991 EPA SI report for the property stated that untreated electroplating wastewater had been discharged to the Mumford River from the property between 1930 to 1965. According to the EPA SI report, an on-site wastewater treatment plant was installed on the property in 1965 and treated wastewater was discharged to the Mumford River from 1965 until September 1982. Between 1974 and 1982 discharge of treated wastewater was carried out under a National Pollution Discharge Elimination System (NPDES) permit (No. MA0001252). The 1991 EPA SI report indicated that the wastewater treatment plant ceased operations in September 1982. The SI report did not indicate why operations ceased. The present owners of the property were unable to provide any additional information concerning the discharge of industrial wastewater to the Mumford River. START personnel were unable to find any additional information concerning the discharge of treated or untreated wastewater to the Mumford River.

Inside the mill complex, approximately 70 55-gallon drums were observed in the manufacturing areas of several of the current tenant companies. Labels on the drums indicated that the drums contained both virgin material and waste products associated with the various operations conducted on the premises by each business. Approximately 50 metal drums were observed with labels indicating that they contained "hazardous waste" or "waste oil".

Many of the companies leasing space within the property utilize flammable material in their manufacturing operations. Numerous explosion-proof flammable materials storage cabinets were observed in various buildings throughout the property. Additionally, several spray booths were observed operating in several of the manufacturing areas located throughout the on-site buildings. Several hazardous materials were observed in use during the on-site reconnaissance. These materials consisted of paints, thinners, solvents, inks, wood stains, adhesives, and cutting fluids/coolants.

According to information START personnel received from WRT after the on-site reconnaissance, at least seven underground storage tanks (USTs) and two additional ASTs exist/existed on the property. Some of the tanks have been removed, some have been filled in place, and some are still in use. A summary of the information concerning the ASTs and USTs is presented in the following Table. START personnel were unable to locate any additional information concerning the removal or fill of the storage tanks.

Site Observations/Concerns (Continued)

Summary of Underground and Above-ground Storage Tanks on the Covitch Property/Former ATF Davidson Co. Property

Underground Storage Tanks			
Location	Size (gallons)	Contents	Status
Adjacent to Bldg. 4	500	Fuel Oil	Removed 1985
Adjacent to Bldg. 23	1,000	No. 6 Fuel Oil	Filled 1987
Adjacent to Bldg. 23	1,000	No. 6 Fuel Oil	Filled 1987
Adjacent to Bldg. 23	1,000	No. 6 Fuel Oil	Filled 1987
Adjacent to Bldg. 12	20,000	Fuel Oil	Filled 1984
Adjacent to Bldg. 4	5,000	Fuel Oil	Active
Above-ground Storage Tanks			
Location	Size (gallons)	Contents	Status
Adjacent to Bldg. 16	30,000	No. 6 Fuel Oil	Removed 1995
Adjacent to Bldg. 12	275	Diesel Fuel	Active
Adjacent to Bldg. 11	5,000	No. 6 Fuel Oil	Removed 1984

Bldg = Building

The information START personnel received from WRT after the on-site reconnaissance also indicated that at least eight transformers which contained polychlorinated biphenyls (PCBs) were formerly located on the property. These transformers were verified to contain PCBs by Transformer Service, Inc. (TSI). A TSI inspection on 15 April 1989 indicated that only one of the transformers was potentially leaking. No further information concerning transformer leakage was available to START personnel. All of the PCB-containing transformers have been removed from the property. A summary of the transformers formerly located on the property is presented below.

Summary of Transformers Formerly Located on the Covitch Property/Former ATF Davidson Co. Property

Location	Capacity (gallons)	Date Removed from Service
Bldg. 9, Floor 2	380	17 December 1993
Bldg. 9, Floor 3	380	6 June 1996

Summary of Transformers Formerly Located on the Covitch Property/Former ATF Davidson Co. Property (Concluded)

Location	Capacity (gallons)	Date Removed from Service
Bldg . 10	445	27 October 1994
Bldg. 12, Floor 1	300	28 June 1995
Bldg. 12, Floor 2	Unknown	Unknown
Bldg. 16	445	6 June 1996
Between Bldg. 16 and Bldg. 4	Unknown	6 June 1996
Bldg. 19	840	27 October 1994

Bldg = Building

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